

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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KEVIN SCOTT,  
Plaintiff,  
v.

Case No. 2:16-cv-13734  
Hon. Denise Page Hood  
Mag. David R. Grand

TROTT LAW, P.C.  
Defendant,

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KEVIN SCOTT, in pro per  
Plaintiff  
29343 Fieldstone  
Farmington Hills, MI 48334

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TROTT LAW, P.C.  
By: Richard Welke (P44403)  
Attorneys for Defendant Trott Law  
31440 Northwestern Hwy., Ste. 200  
Farmington Hills, MI 48334  
248.723.5765

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**TROTT LAW'S FIRST AMENDED WITNESS LIST**

NOW COMES Defendant, Trott Law, P.C. ("Trott" or "Defendant"), by and through its attorneys, Trott Law, P.C., by Richard Welke, and for its First Amended Witness List, states as follows:

1. KEVIN SCOTT.
2. Individuals related to Plaintiff as discovery determined they have relevant information.
3. Current and former employees, representatives, agents, and custodian of records of the law firm of Maddin, Hauser, Roth & Heller, P.C.

4. Current and former employees, representatives, agents, and custodian of records of Bank of America, N.A.

5. Current and former employees, representatives, agents, and custodian of records of J.P. Morgan Chase Bank.

6. Current and former employees, representatives, agents, and custodian of records of the law firm of Bryan Cave.

7. Current and former employees, representatives, agents and custodian of records of Trott Law, P.C., 31440 Northwestern Highway, Suite 200, Farmington Hills, MI 48334. By identifying Trott Law, P.C. herein, Trott Law is not waiving any attorney/client privileges, and only list herein to the extent Trott Law, P.C. may have fact evidence outside the attorney/client privilege or attorney work product.

8. Current and former employees, representatives, agents, and custodian of records of Oakland County Register of Deeds office.

9. Current and former employees, representatives, agents, and custodian of records of Oakland County tax authority.

10. Present and former employees, and the custodian of records of;

a. Local District Court

b. Oakland County, including Circuit Court, Federal Court,  
including Bankruptcy Court

- c. Oakland County Sheriff's Department
- d. Michigan Employment Security Commission
- e. State of Michigan
- f. Local Police & Fire Department
- g. Internal Revenue Service
- h. Oakland County Treasurer & Local Taxing Authority including Assessor(s)
- i. State of Michigan, Department of Treasury
- j. Oakland County Register of Deeds
- k. Oakland County Legal News

11. Any and all parties in this action, regardless of when they were made a party or if they are dismissed.

12. Any and all individuals listed on any title document that appears on the record chain of title for this property.

13. All witnesses identified by any party in discovery, including but not limited to individuals/entities identified in depositions and/or documents produced in discovery.

14. Experts, if any, named in reports disclosed under FRCP 26(a)(2).

15. All necessary rebuttal expert and/or fact witnesses.

16. All individuals necessary to authenticate, interpret, identify, and/or introduce any and all trial exhibits.

17. All witnesses deposed and/or noticed for deposition in this case.

18. All witnesses identified by any other party on their witness list(s) in this litigation.

19. Damages experts, if necessary.

20. All witnesses discovered after the filing of this Witness List.

### **RESERVATION OF RIGHTS**

Discovery is on-going and incomplete. Therefore, Trott reserves the right to supplement and/or amend this list at a later date, e.g., as discovery progresses and/or upon discovery of the other parties' theories and/or previously unknown witnesses and documents. This Defendant(s) reserves the right to amend and/or supplement its Preliminary Witness List based upon any information learned through the discovery process. There are discovery requests outstanding that have not been responded to and this Defendant(s) specifically reserves the right to include any witness, be it individual or entity disclosed or referenced in any response or supplement to any discovery request. Additionally, there may be deposition transcripts in this case. Defendant(s) provides this witness list subject to supplementation. It is based on the

information available at this time. Consistent with the Federal Rules of Civil Procedure and this Court's Scheduling Order, Defendant(s) continues to investigate this matter and reserves the right to supplement this witness list if necessary. Any objection to this Witness List should be formally filed with the court and the undersigned within 10 days of service of this Witness List to enable judicial review or otherwise. Failure to file such objection will result in a waiver of any objection.

Dated: February 13, 2017

Respectfully submitted,  
TROTT LAW, P.C

/s/ Richard Welke  
Richard Welke (P44403)  
Attorney for Trott Law  
31440 Northwestern Hwy, Ste 200  
Farmington Hills, Michigan 48334  
(248) 723-5765

### **CERTIFICATE OF SERVICE**

I hereby certify that on February 13, 2017, I caused to be electronically filed the foregoing papers with the Clerk of the Court using the ECF system which sent notice to all interested parties, and a copy was served via U.S. mail upon:

Kevin Scott  
29343 Fieldstone  
Farmington Hills, MI 48334

Dated: February 13, 2017

Respectfully submitted,  
TROTT LAW, P.C.

/s/Richard Welke  
Richard Welke (P44403)  
Attorneys for Defendant, Trott  
31440 Northwestern Hwy,  
Suite 200  
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